

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: : CHAPTER 13

Gloria Taddei :
DEBTOR : BKY. NO. :17-15877
Gloria Taddei :
Plaintiff :
vs. : ADV. NO.
Bank of America :
Defendant :

COMPLAINT TO DETERMINE SECURED STATUS PURSUANT TO 11 U.S.C 506

1. Debtor filed for protection under Chapter 13 on August 31, 2017.
2. Debtor owns an investment or rental property known as 14 South Madison Avenue, Margate, NJ with a fair market value of \$433,846. Exhibit A.
3. Debtor has a mortgage on this non- residential property with Bank of America in excess of \$900,000
4. Debtor seeks an order determining the secured portion of the mortgage claim to be \$433,846.

WHEREFORE, pursuant to the 11 USC 506 Debtor seeks an order determining the secured claim to be \$433,846.

Respectfully submitted,

Date: **October 2, 2017**

BY: /s/ Michael A. Cataldo
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